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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION**

Case No. C-07-1827 SI

This Document Relates To:

REVIEWERS INDEX

MDL No. 1827

**REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE
(LETTER ROGATORY)**

ALL DIRECT PURCHASER ACTIONS

1 The United States District Court for the Northern District of California presents its compliments
2 to the Appropriate Judicial Authority of Taiwan, and requests international assistance to effect Service of
3 Process to be used in a civil proceeding before this Court in the above captioned matter.

4 I. REQUEST

5 This Court requests the assistance described herein as necessary in the interests of justice. The
6 assistance requested is that the Appropriate Judicial Authority of Taiwan effect Service of Process of the
7 Summons in a Civil Case, the First Amended Complaint, Judge Illston's current Case Management
8 Order, Pretrial Order No. 5 (Docket No. 301), Judge Illston's pertinent Standing Orders ("Judge Illston's
9 Standing Order"; Standing Order Re: Cases Designated for Electronic Filing; and Judge Illston's Case
10 Management Conference Order), Pretrial Order No. 4: Appointment of the Honorable Fern M. Smith as
11 Special Master (Docket No. 244), *Dispute Resolution Procedures in the Northern District of California*
12 handbook, the Notice of Availability of Magistrate Judge to Exercise Jurisdiction and the ECF
13 Registration Information Handout, as well as the Certified Translations of these documents, on the
14 below named business entity, a named defendant in this action:

AU Optronics
No. 1, Li-Hsin Rd. 2
Hsinchu Science Park
Hsinchu 30078
Taiwan

18 The Appropriate Judicial Authority of Taiwan is requested to serve the documents listed above by
19 personal service into the hands of a director, managing agent or other person authorized to accept service,
20 or in a manner of service consistent with the laws of Taiwan.

II. FACTS OF THIS CASE

Plaintiffs, who purchased in the United States Thin Film Transistor Liquid Crystal Displays (“TFT-LCD”) directly from foreign or domestic defendants or their subsidiaries, agents, joint ventures, affiliates, partnerships or associated entities on or about January 1, 1998 through the present, bring this case as a class action. Defendants are leading manufacturers of TFT-LCDs and control the majority of the TFT-LCD industry. Plaintiffs allege that, from at least January 1, 1998 to the present, defendants conspired, combined and contracted to fix, raise, maintain, and stabilize the prices at which TFT-LCDs

1 were sold in the United States. Beginning at least as early as January 1, 1998, the exact date being
2 unknown to Plaintiffs, defendants by and through their officers, directors, employees, agents, or other
3 representatives, entered in a continuing contract, combination or conspiracy to unreasonably restrain
4 trade and commerce in violation of Section 1 of the Sherman Antitrust Act, 15 U.S.C. §1. As a result,
5 Plaintiffs were forced to pay more for TFT-LCDs than they would have paid in a competitive TFT-LCD
6 market. For its injuries, Plaintiffs are requesting treble damages and an injunction enjoining defendants'
7 anti-competitive activity under sections 4 and 16 of the Clayton Act, 15 U.S.C. §§ 15 and 26.

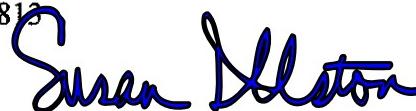
8 **III. RECIPROCITY**

9 The United States District Court for the Northern District of California is willing to provide
10 similar assistance to the judicial authorities of Taiwan.

11 **IV. REIMBURSEMENT FOR COSTS**

12 Counsel for Plaintiffs is willing to ensure reimbursement to the judicial authorities of Taiwan for
13 costs incurred in executing this letter rogatory. If the cost of executing this Court's letter rogatory
14 exceeds \$500.00, the judicial authorities of Taiwan are requested to contact the following counsel for
15 Plaintiff:

16 R. Alexander Saveri
17 Saveri & Saveri, Inc.
18 111 Pine Street, Suite 1700
19 San Francisco, CA 94111
Telephone: 415-217-6810
Facsimile: 415-217-6813



20 Dated: _____, 2007.
21 [COURT SEAL]
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The Honorable Susan Illston
United States District Court
Northern District of California
450 Golden Gate Ave.
San Francisco, CA 94102
United States of America

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